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BY ECF

March 6, 2025

The Honorable Pamela K. Chen
United States District Judge
United States District Court, Eastern District
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Securities Exchange Commission v. Xia, et al.* U.S. Dist. Ct., Dkt. No. 21-Civ-5350 (PKC) (JAM)

Dear Judge Chen,

We represent Defendants Richard Xia (“Xia”) and Fleet New York Metropolitan Regional Center, LLC (“Fleet”) in the above-referenced matter. We write to respectfully request a brief one-week extension, until March 13, 2025, to submit a proposed modification to the SEC’s draft Proposed Order (ECF No. 557-1).

Earlier today, Mr. John Leo, his counsel, and Mr. Xia conferred regarding the structure of Mr. Leo’s proposed modification. While discussions have been productive, additional time is needed to work through certain details to ensure that the proposed structure is fully developed before submission to the Court.

We apologize for any inconvenience this may cause and appreciate the Court’s consideration of this request.

Respectfully submitted,

/s/ Robert J. Hantman, Esq.
*Attorney for Defendant Xia
and Fleet*

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